

HWACalendar

GOVERNMENT DOCUMENT
COLLECTION

NOV 4 1991

University of Massachusetts
Depository Copy

NOTE:

There will not be an August HWAC meeting. Instead the Steering Committee for HWAC will meet at 10:00 a.m. in the 5th floor conference room at DEP. Please note that the September HWAC will take place as usual on Wednesday September 19 at 9:30 a.m. in the DEP 5th floor conference room.



Massachusetts Hazardous Waste Management Advisory Committee

Members present: Cahaly, Cox, Daniels, Hickman, Mascoop,
LaCouture, Rubinstein, Duxbury

Members absent: Baxter, Davis, Ozonoff, Ruddock, Prahm

Lynn Rubinstein chairing the meeting received announcements from Susan Green, who announced that Rosemary Healey will now be coordinating HWAC meetings. The committee requested followup information on the briefing Deirdre Doherty gave last month on upgrading underground storage tanks in water supply areas. The information will be mailed to members when available.

The minutes of the July 18, 1990 meeting were approved as written.

Lengthy discussion ensued on the role of HWAC. Andrew Daniels raised the following:

1) attendance and participation by members. Concern was expressed that some members are on the committee but do not attend meetings regularly.

2) reconnection of the Committee- who are the members representing? including backgrounds, interests, and specialties.

3) What should the role of the steering committee be?
Dick Cahaly wanted to know how many HWAC members the statute requires, as well as the number appointed and the attendance rates of the various members. Al Shaines questioned the representation of HWAC i.e. is HWAC adequately represented by both the business community as well as environmental groups. Discussion then centered on the steering committee and the fact that it has not been meeting regularly. Dick Cahaly stated that for the first 5 or 6 years the steering committee met regularly (once/month) and had substantive discussions, but lately have not met at all. Lynn Rubinstein felt that there is not the same level of support from DEP for the steering committee.

Issues of leadership emerged and the question was raised "who should be setting the HWAC agenda"? Group members felt that other priorities sometimes outweigh HWAC involvement, which has left a void that DEP has stepped in to fill. Dick Cahaly recommends a steering committee member be appointed with a new perspective i.e. someone who can take an aggressive leadership role. He volunteered to step down, but agreed to remain a member until someone with a business perspective can be appointed to fill a void that would exist in his absence.

Andrew Daniels volunteered to serve as chairman of the steering committee. Robert Cox made a motion to appoint Andrew to chair and the motion was carried. The steering committee will consist of Gary Prahm, Lynn Rubinstein, Sally Davis, Dick Cahaly, and Andrew Daniels as chair. Dick Cahaly suggested sending a form letter to HWAC members who have not been attending meetings regularly, so that a possible alternative to replace them could be suggested. Dick followed up by making the point that attendance in the last year has been as good as in the mid 1980's when RCRA was facing critical issues.

Bill Cass stated that DEP is currently facing critical issues which require setting priorities-DHW will look to HWAC for guidance and direction.

The 21-C statute mandates that 8 individuals be appointed from designated organizations to serve on HWAC and that up to 6 public members be appointed (no designated affiliation is required). Nancy Wrenn stated that EOEPA wants to fill any existing HWAC vacancies before the start of the next political administration. Al Shaines noted that a public member of HWAC cannot be a Massachusetts regulated company, because of the appearance of conflict of interest.

HOUSEHOLD HAZARDOUS WASTE

Nancy Wrenn began the discussion by stating that household hazardous waste is a chronic problem, generating many telephone calls from an environmentally conscious public. She handed out a proposed "Planning for Household Hazardous Waste Action" which outlined goals for the HWAC to consider in the next few months. Bill Cass asked for HWAC's support in formulating an Action Plan. Al Shaines stated that the high costs to the community of one day collections is a major concern. Ethan Mascoop stated that his office receives many calls from Somerville residents on what to do with their household hazardous waste.

Bill Cass stated that household hazardous waste is very related to the solid waste program and specifically to source separation. Dana Duxbury gave a global presentation on household hazardous waste and started off by saying that one day collections while extremely important, are also costly. This fact necessitates that alternatives be considered. Also, participation rates at these collections are not considerable. While Massachusetts currently has the national lead in number of collections held, we will not maintain this given our present rate (39 so far this year). Dana urged that we consider a variety of activities, including innovative specialty programs. A well thought out program may include one day events and/or a permanent collection center but must also offer extensive education to affect consumer buying habits. She suggested that we look for corporate sponsors for collection of HHW from employees, work with manufacturers to reduce toxicity, maximize recycling in stores and at permanent centers and one day events, integrate with solid waste planning, particularly in terms of volumes and toxicity, we should target certain wastes going to incineration, e.g. mercury batteries, should consider curbside collection of certain wastes, e.g. paint, and oil, and we should incorporate permanent HHW facilities with MRF's. Dick Cahaly suggested that the real estate industry might work directly with the community as a public service and Dana agreed that "Welcome Wagon" is also a way of reaching newcomers about HHW and SW disposal. The ethic of conservation and recycling should be stressed.

Barbara Kelley from DEM stated that despite a lack of staff and grant money, DEM continues to provide technical assistance to communities which are organizing household hazardous waste collections. She would encourage solid waste districts to include HHW in their planning. DEM worked with DEP to establish regulations for permanent collection centers, based on the Martha's Vineyard pilot. She sees the possibility of adding to the regulations to allow satellite collections, or other innovative approaches, such as the Seattle wastemobile, which makes services more accessible.

HWACalendar

Lynn Rubinstein stated that Franklin County has used groundwater protection as their rationale for HHW management, rather than hooking up to solid waste. She stressed the need to involve the Dept. of Education to reach elementary school children and urged that Mass. take a strong regulatory stance in banning certain products, such as septic system cleaners, and requiring that household chemicals be sold in smaller packages. She suggested that the State organize paint swaps and she would like to distribute a list of places which take back used oil.

Toxicity Characteristic(TC)

Stephanie Goodwin from EPA spoke on the new TC(toxicity characteristic) test procedure, which modifies the EP toxicity test and also adds 25 organics to the list. The effects of TC are far reaching as previously unregulated companies now subject to TC could be required to come into the system, and the status of existing companies could change as well. Critics of the EP toxicity test felt that it didn't address all of the toxics that could affect human health and the environment. EPA will be enforcing TC while the state will enforce the EP toxicity test until they adopt the rule.

Susan Green of DEP feels that it is prudent to adopt the rule ahead of the normal schedule, so that companies will not have to test for both. While the state can only enforce EP toxicity, EPA can enforce TC, which could potentially place Mass. generators into a double bind situation if TC is not adopted. Exemptions from testing for TC under the new rule include: 1) waste oil that is going for recycling(burning for energy recovery or reuse) 2) contaminated soil resulting from underground storage tanks, covered under subtitle I corrective action 3) household hazardous waste 4) listed waste(TC only addresses EP Toxicity)

Questions on TC can be addressed to EPA (617)223-5527. EPA has prepared an outreach package which will be sent to generators, trade associations, and various other groups. LQG's that were previously unregulated and now have TC waste must have notified EPA by June 30th. Don Hickman asked "what enforcement action will EPA take against companies missing the deadline"? Stephanie stated that enforcement discretion will be the guiding principle.

A vote was put on the floor to either adopt or deny recommending TC. The committee voted in favor of adopting TC. TC will go out for public hearing and we should have a regulation by late September.

Andrew Daniels proposed that no August HWAC meeting be scheduled, but instead suggested a planning session for the steering committee, of which he is the newly appointed Chairman. The group decided in favor of this motion, and the session will be scheduled for August 15 at 10 a.m. DEP 5th floor conference room.

adjourn

HWACalendar

*** July 18, 1990 ***

*** MONTHLY MEETING ***

DEP, FIFTH FLOOR, ONE WINTER STREET, BOSTON, MA 02108

Published by the Division of Hazardous Waste for the
HAZARDOUS WASTE ADVISORY COMMITTEE

For more information call Rosemary Healey at 617/556-1023

9:30	Announcements	
9:40	Continuation of Discussion on the Role of HWAC	HWAC Committee
10:30	Household Hazardous Waste - Program in Massachusetts and Future Directions	Gary Prahm Others TBA
11:30	Toxicity Characteristic Rule Proposal: Substitute Annual Reports with Biennial Reports	Stephanie Goodwin Susan Green
12:00	Adjourn	

PLEASE NOTE THE LOCATION OF THE MEETING!!

Subcommittee Schedule:

FRSC	July 10	9:30 AM	DEP 5th Floor
Transporters	July 11	10:00 AM	DEP 5th Floor

HWACalendar

*** September 19, 1990***

*** MONTHLY MEETING ***

DEP ONE WINTER STREET BOSTON, MA 5TH FLOOR CONFERENCE ROOM

Published by the Division of Hazardous Waste for the

HAZARDOUS WASTE ADVISORY COMMITTEE

For more information call Rosemary Healey at 556-1023

9:30 Announcements

9:50 Brief Status Update on Reg Packages(TC & Manifest)

10:00 Comments/Discussion on Proposed TC Regs Susan Green

Susan Green and HWAC

10:45 Solid Waste Briefing-upcoming ban on lead acid
batteries and other recycling initiatives
Philip Weinberg DEP DSWM

11:15 Fees

Jim Miller
Cynthia Bellamy
Skip Russell

12:00 Adjourn

PLEASE NOTE THE STEERING COMMITTEE WILL MEET IMMEDIATELY
FOLLOWING THE HWAC MEETING!!!!!!

HWACalendar

*** November 14, 1990 ***

*** MONTHLY MEETING ***

DEP ONE WINTER STREET BOSTON, MA 5TH FLOOR CONFERENCE ROOM
Published by the Division of Hazardous Waste for the
HAZARDOUS WASTE ADVISORY COMMITTEE
For more information call Nancy Wrenn at 292-5587

9:30	Announcements	
9:40	Cost Comparison of 1-Day Household Hazardous Waste Collection Events vs. Permanent Collection Centers	
		Steve Anderson
10:30	MAV Registration Program	Nancy Wrenn Jim Miller
11:15	Fees and/or Discussion of Impact of CLT	Bill Cass
12:00	Adjourn	

PLEASE NOTE THE STEERING COMMITTEE WILL MEET IMMEDIATELY
FOLLOWING THE HWAC MEETING!!!!

Subcommittee Schedule:

Transporters	November 6	DEP, 5th Floor, 10:00
FRSC	November 29	DEP, 5th Floor, 9:30



Massachusetts Hazardous Waste Management Advisory Committee

Minutes of October 17, 1990

Members present: Prahm (chair), Cox, Davis, Raymond, Rubinstein, Ruddock

Members absent: Baxter, Cahaly, LaCouture, Mascoop, McGregor, Ozonoff

Bill Cass announced that the second meeting of the Siting Policy Committee would be on October 18 and Thursday mornings thereafter until December 1. Susan Green announced there would be a Federal Regulations Subcommittee meeting at 9:30 on October 23.

Nancy Wrenn reported that the Mass. Water Resources Authority, which services about half the state's population, has received an EPA grant to do a pilot household hazardous waste program. They will be pleased to come to HWAC and present their plans, which are designed to measure the impact of education and collection on the quality of their treatment plant effluent and sludge. The initial phase will begin soon with the establishment of waste oil collectors at four sites, about to be designated. One of the locations is the city of Cambridge, where a used oil ordinance was just passed.

Another study by Steve Anderson of Franklin County, comparing costs of single day collections with permanent, has been offered as a topic for a future HWAC meeting.

Bill Cass reported on the estimated impact of passage of the CLT referendum on the Division of Hazardous Waste. In a worst case scenerio, which the Commissioner believes is highly unlikely, the Department would have to sustain staffing cuts of 50 - 60%. This figure is so high because the cuts would have to be taken in a six month period (Jan. 91 - June 91) as opposed to in one year.

The Division is already down 20 people from the 1988 staffing level. Federal cuts are likely to be 5% but the program will still have more grant money than last year due to FY91 RCRA grant increases. He also reported that 2 positions in regulations and outreach have been eliminated from the Bureau of Waste Prevention as well as 24 positions in the State laboratories. However, due to staffing increases from the fees and program improvements effort and TURA, people can be shifted to perform other duties.

A Memorandum of Agreement could be written with EPA if Mass. were unable to meet their 25% match on the federal grant and therefore, were to lose authorization. Because the Mass. program is now broader in scope, the following could be cut and authorization could still be maintained:

- Very Small Quantity Generator program, including outreach, waste oil, and household hazardous waste
- Licensed transporter program (no licensing or reporting, fees would be reduced to pre-CLT level at 9 cents/gallon)
- Technical assistance (Hot Line for industry)
- Non-Federal Program, Policy and Regulations development (would reduce ability to streamline the regulations and encourage waste prevention)
- Recycling (contaminated soil would not be controlled)
- Waste tracking under the manifest and monthly operating report for transporters (including Capacity Assurance planning which affects State Superfund funding)
- Inspections by the Regional offices would go down (currently 49 TSDF's are done - 18 more than Federal requirement, and 276 LQG's - 199 more than required); enforcement actions would therefore drop.
- Corrective Action would drop (only 1 is currently required, DHW is doing 8)

Bob Cox questioned what would happen to contaminated soil if the recycling program was dropped. Response: it could be stockpiled or sent to other states. JoAnn Collins urged that there be a registration program for transporters, at a minimum.

Bill Cass stated that he wanted to followup on HWAC's concern from the last meeting about permits being revoked for non-payment of fees. The Department is now considering a two-step process for suspension of "permit" under the new Fees Program. Also, SQG's will be given an opportunity to change status to VSQG before bills go out. Certain hardship cases will be granted extended payment time.

The next meeting of HWAC will be on November 14.

HWACalendar

*** December 19, 1990 ***

*** MONTHLY MEETING ***

DEP ONE WINTER STREET BOSTON, MA 5TH FLOOR CONFERENCE ROOM
Published by the Division of Hazardous Waste for the
HAZARDOUS WASTE ADVISORY COMMITTEE
For more information call Nancy Wrenn at 292-5587

9:30	Announcements	
9:40	1990 Program Accomplishments -- Summing Up and Looking Ahead	Jim Miller Bill Sirull Nancy Wrenn Susan Green
10:30	Siting Policy Report Recommendation - 150B regs	Lynn Rubinstein Steve Dreeszen -- Bill Cass
11:30	BWP Program Improvements/Fees	Bill Cass
12:00	Adjourn for Holiday Party	

We hope you'll join us for our holiday party. Please let us know if you're coming by calling Nancy at 292-5587 or Susan at 292-5582. The cost is \$5.00 per person.

1/16 next mtg



Massachusetts Hazardous Waste Management Advisory Committee

Minutes of November 14, 1990 Meeting

Members present: Prahm (chair), Rubinstein, Lacouture

Members absent: Baxter, Cahaly, Cox, Davis, Mascoop, McGregor, Raymond, Ruddock

Guest presenter: Steven Anderson, Franklin County Solid Waste Management District planning consultant

The minutes from the October 17 meeting were approved as written. Gary Prahm introduced Lisa Dufresne, new hazardous waste planner at the Cape Cod Commission, who will be recommended as his replacement on HWAC.

Lynn Rubinstein introduced Steve Anderson, who described his study of comparison of one-day household hazardous waste collections with a potential permanent collection center.

The study looked at factors affecting participation and concluded that advanced publicity is significant in encouraging participation; pre-registration allows the flow to be better controlled; the longer the program has been offered, the more participants; for households, Saturday is the most popular day of the week, for VSQG's a weekday would be preferable; and the convenience and accessibility of the location was not as significant a factor in participation as cost. Some considerations in looking at the permanent collection approach were the advantage of moving full drums only and the disadvantage of having to train staff and provide liability insurance.

The study considered several scenarios, based on 4% participation and 3%. The cost difference between one-day events with 4 collections a year and one permanent center with 4 collections was not significant, varying from \$70/car to \$77/car. The conclusion was that the cost to the district towns of supporting a permanent center would double, which is not currently attractive politically while other public services are being jeopardized by limited funds. Therefore, the district has decided to hire an education person to do outreach and lobbying for hazardous waste prevention, recycling, and will continue to offer some single day collections. Anderson concludes that the cost of disposal of hazardous products should be included in the purchase price and that this money should be channeled back to towns to fund collections and VSQG's should be charged a fee for disposal service.

Nancy Wrenn described a proposed plan to streamline procedures for SQG's of waste oil and VSQG's in obtaining an ID for use on a manifest. As of January 1, 1991, the current ID's will be extended indefinitely. It is proposed that a generic ID would be assigned to new notifiers in these groups. Currently, there are 10,000 DEP-assigned numbers and the data base is growing at the rate of 300/month. VSQG's will be the largest portion of the total regulated community when many SQG's convert to VSQG within the next month, as a result of a DEP mailing to clarify status prior to January compliance fee bills. (These companies can retain their existing EPA ID, which is site-specific.) Access to information about new notifiers may be limited.

Susan Landau, Mass. DPW, said that the VSQG self-transport option, which does not require a site-specific ID, is practical for many small DPW locations which can bring their waste to a central depot. Gary Prahm noted that the information from DEP's data base has been useful to the Cape Cod Commission in its planning and outreach activities.

Bill Cass reported on the status of programs at DEP. Many of the Bureau of Waste Prevention's activities are in the process of being consolidated. Toxics Use Reduction (TUR) will pull together program planning and development in industrial wastewater and hazardous waste, as well as an industrial solid waste component. The Air Quality program, however, will be heavily focused on the implementation of the new Clean Air Act. The household hazardous waste effort which has been underway in the hazardous waste program needs to be tied in with the solid waste program and the development of solid waste recycling facilities. Replication of the cross-media "Blackstone Project" will be done, with existing staff, in each region. In the TUR program, different models for defining "production units" are being tested by 10-15 volunteer companies. An adjustment in TUR fees to be coordinated with other DEP fees is under consideration.

Lynn Rubinstein reported on the progress of the recently formed Siting Policy Committee, which has been asked by Sec. DeVillars to develop recommendations on strategies for siting hazardous waste facilities. Included on the committee are Sue Raymond and Dick Cahaly of HWAC, and representatives of the Site Safety Council. The committee has identified steps in a simplified process, which include a Needs Policy Statement and Technology Assessment and a mechanism for selected facility proponents to gain broad state support.

Al Shaines noted that SBANE and AIM have proposed an "authority" which would help to finance and promote such projects. The concept of a "rebuttable presumption" as a method of setting standards for site suitability was discussed.

Members agreed to a \$5 contribution for the holiday party.

HWAC calendar

*** January 16, 1991 ***

*** MONTHLY MEETING ***

DEP ONE WINTER STREET BOSTON, MA 5TH FLOOR CONFERENCE ROOM

Published by the Division of Hazardous Waste for the
HAZARDOUS WASTE ADVISORY COMMITTEE

For more information call Nancy Wrenn at 292-5587

9:30	Announcements	
9:40	Household Hazardous Waste and Waste Oil Program at MWRA	Denise Brightnecker
10:15	Discussion of Proposed Federal Regulations: Third Third Land Ban Listings of Mining Wastes (Bevill Amendments) Rule on Mandatory Analytical Methods	Susan Green
11:00	Activities of the Low Level Radioactive Waste Management Board	Carol Amick
11:45	Election of New Steering Committee	HWAC members

Subcommittee Schedule:

FRSC	January 10th	9:30 AM	N.E. Electric, Westborough
Transporters	February 6th	10:00 AM	DEP, Boston, 5th Fl.



Massachusetts Hazardous Waste Management Advisory Committee

Minutes of December 19, 1990

Members present: Cahaly (chair), Davis, McGregor, Prahm, Raymond, Rubinstein

Members absent: Baxter, Cox, Lacouture, Mascoop, Ozonoff, Ruddock

The minutes from the 11/14 meeting were adopted as written.

Bill Sirull of the Enforcement staff offered a hand-out of Enforcement Summaries for the past three years with sample criminal and civil case summaries from SFY/FFY 90. He noted that the Northeast Region had been able to issue nearly three times the number of Notices of Non-compliance in SFY 90 as they did in the previous year, due to an increase in staff. The Department's new Settlement Policy has resulted in more Consent Orders with penalties but there is no overall trend toward an increase in number of enforcement penalty actions. A major initiative in the Legal Office to reduce the backlog of appeals resulted in many pre-hearing conferences and settlements.

Jim Miller, chief of Compliance and Enforcement, summarized the work which has been done during the past year in information management. He distributed a hand-out which included a notice to waste oil shippers and VSQG's about the extension of DEP-assigned ID numbers and the use of a new 4-part manifest, the results of a transporter survey on the use of electronic reporting, and a letter which went to all SQG's to allow change of status to VSQG prior to the fee statement which will be mailed in January. The number of manifests which will be received at DEP is expected to decrease from 500,000 to 125,000 with the implementation of the 2-part and new 4-part manifest requirements. The database is being converted from IBM to VAX format. New software will allow for more efficient manipulation of the data. The count of LQG's of hazardous waste is now 958, excluding those which are LQG's of waste oil only, and the number of SQG's appears to have been significantly reduced, as a result of the mailing.

Nancy Wrenn reported on the Pesticide Amnesty program, which allowed applicators with unusable pesticides to get rid of their stored products without penalty for storage. Clean Harbors, the selected vendor, offered training to 2,000 pesticide users. Five hundred of those who attended the training pre-registered for the collection and 450 of these participated in the five collections, which were held in August. A total of 250 gallons of dioxins, 2,750 gallons of liquid pesticides and 40,000 pounds of solid pesticides was collected. The next step is to assure that there

is a reasonable grace period in which those who are holding cancelled products can return the product to the manufacturer or safely use up the product so that this accumulation problem will not reoccur. A volunteer from HWAC was requested to join the Pesticide Bureau advisory committee and the pesticide applicator network in working on a strategy to accomplish this.

Cynthia Bellamy Chaves described a new piece of legislation which has been filed by Rep. Angelo which would require towns to collect waste oil and would mandate curbside collection if the community has solid waste curbside pick-up. A fund would be established, based on 28 cents/gallon of motor oil at time of purchase, which would allow for the retrofitting of trash trucks and other grants to assist communities in implementation.

Ken Hagg, Assistant Commissioner of DEP, expressed thanks to the Committee for the work which they have done and challenged them to become more broadly focused in the coming year. The various advisory committees related to programs within the two year old Bureau of Waste Prevention share some members in common and similar goals. Relating hazardous waste programs to Toxic Use Reduction and the new Clean Air Act with its 186 air toxics will be the new focus, he suggested.

Susan Green summarized the 1990 changes in regulations, which, to meet federal requirements, included modification procedures for TSDF licenses, hazardous waste listings, and adoption of the TCLP rule. State optional regulations included the change to a 4-part manifest, electronic reporting for transporters, the amnesty for pesticide storers, waste oil tank regulations, extension of the Insolvency Fund, a change from Annual Reporting to Biennial Reporting for LQG's, and amendments to VSQG regulations. The remainder of the Land Ban Rule and standards for organic air emissions for TSDF's will be on the regulatory agenda for next year.

Lynn Rubinstein, co-chair of the Siting Policy Task Force, reported on the recommendations of the 7-week effort: a new Hazardous Waste Facility Development Board would replace the existing Site Safety Council and would be charged with producing a state-wide hazardous waste management plan (including household hazardous waste) and issuing requests for proposals for specific technologies and types of facilities needed to treat or dispose of the Commonwealth's hazardous waste. Using Solid Waste Siting regulations as a model, DEP would be charged with developing regulations for 21D and 150B. The role of the state would not be to select specific sites but to provide leadership at the highest level to promote selected developers. Greg McGregor urged that the proponents approach the Governor-elect and the new EOEA secretary now to report the Task Force's findings. A motion in support of this recommendation was approved unanimously.

Karl Eklund, who had worked with an earlier advisory committee to develop regulations for 150B, stated that there had been a deadlock between those who wanted to preserve the power of local boards of health and those who wanted to site a facility. He sees 310 CMR 16. (Solid Waste regulations) as a model. Steve Dreeszen, chief of licensing, said that the Location Standards in 310 CMR 30.705 need to be revised also. He noted that the proposed Recontek facility which is currently in the siting process is headed for a ruling on site suitability but a local referendum may discourage the developer. Another issue, applicability of 150B to existing TSDF's, is expected to be decided by the SJC in June. Dreeszen recommended confining the regulations to new TSDF's only.

Bill Cass offered several topics which are on the Department's agenda for 1991.

1. Commissioner Greenbaum has urged that the Siting Report include household hazardous waste in its considerations, to help build individual sense of responsibility for disposal of all hazardous wastes. HWAC will therefore continue to address this issue and develop a strategy. This would include the reinforcement of legislation such as that dealing with waste oil. He also sees the need for industry to articulate more clearly the importance of disposal facilities.

2. Program improvements and related fees will require predictability in the permitting process. Application forms are now being streamlined and instructions standardized. The "whole facility" approach will be supported by a new Facility Master File, which will combine 26 separate DEP data bases. Data reconciliation has been a major work effort and will continue to be as the year progresses.

3. Compliance information and outreach on a cross-media basis is planned, and includes training for the regulated community, development of integrated inspection checklists, direct mailings to targeted segments, and strategies for reaching companies which are not usually inspected, such as VSQG's. Also in the planning stage is reduction of overlap in regulations, e.g. toxic use reduction and Right-to-Know, and certification of specialists, such as toxic use reduction planners, for which an exam is due by 1/92.

Copies of the Siting Policy Report were offered and a sign-up sheet for new sub-committees on 150B regulations and household hazardous waste.

The next HWAC meeting is scheduled for January 16.

The first thing I noticed when I stepped out of the car was a cold, crisp breeze. It felt like a fresh start, a new beginning. I had just finished a long drive, and the air was perfect. I took a deep breath, feeling the coolness on my face. The sun was just starting to rise, casting a soft glow over the landscape. I could see the rolling hills in the distance, and the trees were still covered in a light frost. It was a beautiful sight, and I felt a sense of peace and tranquility. I walked slowly, enjoying the quiet solitude of the morning. The only sound was the crunch of my boots on the snow. I felt like I was in a dream world, a place where everything was perfect and just what I needed. I had been so stressed lately, and this moment felt like a gift. I was grateful for the chance to take a break and enjoy the beauty of nature. It was a reminder that life is short and that I should appreciate the little things. I took another deep breath, feeling the cold air fill my lungs. I was ready to face whatever came my way, knowing that I was in good luck.

At the moment, I was feeling a sense of calm. The world around me was so peaceful, and I felt like I was in a safe place. I had been so busy lately, and this moment felt like a gift. I was grateful for the chance to take a break and enjoy the beauty of nature. It was a reminder that life is short and that I should appreciate the little things. I took another deep breath, feeling the cold air fill my lungs. I was ready to face whatever came my way, knowing that I was in good luck.

The first thing I noticed when I stepped out of the car was a cold, crisp breeze. It felt like a fresh start, a new beginning. I had just finished a long drive, and the air was perfect. I took a deep breath, feeling the coolness on my face. The sun was just starting to rise, casting a soft glow over the landscape. I could see the rolling hills in the distance, and the trees were still covered in a light frost. It was a beautiful sight, and I felt a sense of peace and tranquility. I walked slowly, enjoying the quiet solitude of the morning. The only sound was the crunch of my boots on the snow. I felt like I was in a dream world, a place where everything was perfect and just what I needed. I had been so stressed lately, and this moment felt like a gift. I was grateful for the chance to take a break and enjoy the beauty of nature. It was a reminder that life is short and that I should appreciate the little things. I took another deep breath, feeling the cold air fill my lungs. I was ready to face whatever came my way, knowing that I was in good luck.

At the moment, I was feeling a sense of calm. The world around me was so peaceful, and I felt like I was in a safe place. I had been so busy lately, and this moment felt like a gift. I was grateful for the chance to take a break and enjoy the beauty of nature. It was a reminder that life is short and that I should appreciate the little things. I took another deep breath, feeling the cold air fill my lungs. I was ready to face whatever came my way, knowing that I was in good luck.

The first thing I noticed when I stepped out of the car was a cold, crisp breeze. It felt like a fresh start, a new beginning. I had just finished a long drive, and the air was perfect. I took a deep breath, feeling the coolness on my face. The sun was just starting to rise, casting a soft glow over the landscape. I could see the rolling hills in the distance, and the trees were still covered in a light frost. It was a beautiful sight, and I felt a sense of peace and tranquility. I walked slowly, enjoying the quiet solitude of the morning. The only sound was the crunch of my boots on the snow. I felt like I was in a dream world, a place where everything was perfect and just what I needed. I had been so stressed lately, and this moment felt like a gift. I was grateful for the chance to take a break and enjoy the beauty of nature. It was a reminder that life is short and that I should appreciate the little things. I took another deep breath, feeling the cold air fill my lungs. I was ready to face whatever came my way, knowing that I was in good luck.